

Before  
the  
Federal Communications Commission  
Washington, DC 20555

In the Matter of	)	
	)	
Proposed Changes in the Commission's Rules	)	ET Docket No. 03-137
Regarding Human Exposure to Radiofrequency	)	(Terminated)
Electromagnetic Fields	)	
	)	
Reassessment of Federal Communications	)	ET Docket No. 13-84
Commission Radiofrequency Exposure Limits and	)	(Terminated)
Policies	)	
	)	
Targeted Changes to the Commission's Rules	)	ET Docket No. 19-226
Regarding Human Exposure to Radiofrequency)	)	
Electromagnetic Fields	)	
<b>PETITIONS FOR RECONSIDERATION OF</b>	)	<b>Report No. 3155</b>
<b>ACTION IN PROCEEDINGS</b>	)	<b>FRS 16970</b>

**To:** Federal Communications Commission, Washington, DC 20554

**Date:** Sept 25, 2020

**Comments Filed By:** Kevin Mottus, Outreach Director, California Brain Tumor Association. Email: KevinCABTA@hotmail.com

## OPPOSITION TO THE PETITION

We oppose The Petition For Reconsideration by The National Spectrum Managers Association as written by attorney Donald J. Evans report #3155 regarding ET Docket # 03-137, ET Docket #13-84 and ET Docket #19-226 as these petitions as listed below because Power Density measures and other safety protocols to measure power and exposure levels need to be adhered to strictly to protect the public's health given the evidence and arguments attached to this comment and other comments by the commenter

and given the thousands of pieces of evidence that RF is hazardous submitted as public comments in FCC ET Docket # 03-137, ET Docket #13-84 and ET Docket #19-226.

Furthermore, in the Petition Mr. Evans states that there is not a human health risk from focused beams of signals because it does not radiate in the same direction all the time and virtually not in the same spot. Mr. Evans is an attorney and I do not know what science he is basing this assumption on but it is counter to the thousands of studies and statements by actual scientific experts referred to and many of which are attached to Dockets 13-84 and 19-226, 03-137 which state clearly they expect 5G, particularly millimeter waves, and most particularly focused beams of RF energy used by these systems to be bioactive and lead to biological and health effects.

Please Mr. Evans provide the scientific evidence to prove this clearly false statement that underlies your petition request. I suggest the FCC add to its requirements based on Mr Evans clearly false statements the requirement to biologically safety test these antennas before allowing them to operate which would clearly demonstrate the existence and need to prevent biological and health effects.

It is the focused beams because of their focus and intensity that are expected to heat more than previous technologies using frequencies under 6Ghz. It is also hard to imagine that the focused beams will not radiate in the same direction on same spot, especially when a long hour long phone call is being made with the same phone, held by the same user often times directly against the head.

Mr. Evans proposes that an alternative method of evaluating the signals be used other than the ones outlined in OET-65 and approved by KDB. Clearly this is an effort by Mr Evans and his association to work around the requirements for safety testing, thus putting the public health which these rules seek to protect in jeopardy. But I am not surprised by Mr. Evans' effort since we fully expect these focused beams of signaling used by these advanced wireless systems referred to by 19-226 to cause heating that would violate current FCC guidelines below 6Ghz designed to prevent heating - see studies on millimeter wave effects attached to this comment and other comments by this commenter and the documents attached to 13-84,19-226, 03-137 in public comments. For this reason, we ask the FCC to reject this attempt to work around these rule and work around its intent to protect the public who are being involuntarily exposed to these increasing levels of RF radiation emitted by these devices and antennas.

Mr. Evans reasons in this petition that old RF Hazard Rules that have been in place for decades will protect the public while industry takes years and years measuring their RFR exposure to the public. First of all, the attached arguments and evidence submitted to the dockets mentioned above in the form of public comments and in the legal challenge of Ehtrust & CHD vs the FCC and attached to this comment prove why our decades old RF hazard rules are sorely deficit. Included in the public comments of the FCC dockets mentioned above are hundreds of testimonials of innocent Americans already being harmed and killed by Radio Frequency Radiation.

Clearly these inadequate FCC rules were intended to address exposures under 6Ghz and were not intended in any way to address exposures over 6Ghz up to 100Ghz and beyond as the new 19-226 rulemaking is designed to address. Additionally, the 19-226 rulemaking includes a backing away from the SAR standard protections replacing it with power density. So for Mr. Evans to say that the old safety rules below 6Ghz will provide adequate protection when SAR is being dropped over 6Ghz in 19-226 is simply dangerously inaccurate. None of the old FCC safety rules that MR Evans refers to in 13-84, 19-226 or 03-137 takes into account non-thermal biological and health effects which have been scientifically proven - but have been ignored by the FCC.

In addition, particularly as it pertains to FCC Docket 19-226, SAR measures need to be retained to take into account more than just the level of emissions from the device or antenna but more importantly the biological and health impact on humans being exposed, usually involuntarily.

Our current measures of Power Density and SAR need to be retained but they are not enough because they do not take into account biological effects from long term, cumulative RFR exposure and they do not take into account non-thermal effects which have been proven conclusively. Measures which take into account these long term, cumulative effects and non-thermal effects must be added to begin ensuring the safety of wireless technology for the public which we know at this time to NOT be safe as demonstrated by the evidence and arguments attached to this comment and Dockets listed above.

Most importantly, additional more specific measures which measure the changes in cellular bioactivity within human cells, between human cells and effecting all human system (nervous, cardiovascular, circulatory, immune, optical, etc) caused by human exposure to wireless RadioFrequency Radiation or RFR from wireless devices and antennas need to be added.

Experts with expertise in the biological and medical sciences should be establishing these measuring and testing protocols not engineers, technicians and lawyers employed by the FCC. Having engineers establish these protocols and associated rulemakings is completely inappropriate and renders these rules and/or modifications of these rules by the FCC meaningless, dangerous, and null and void due to the FCC's staff overall lack of understanding of the biological impact of wireless RFR on the human body and systems the FCC pretends to be addressing with these rulemaking and modifications to these rulemakings.

Therefore, power density should continue to be measured and requirements to measure PD and timelines to do so should be adhered to strictly to protect the public's health. SAR should be retained or added to take into account the biological impact of these exposures which is critically important to protecting the public's health. Additional measures which take into account cumulative, long term and non-thermal effects should be added immediately. Additionally sophisticated measures of cellular activity within cells, between cells, and effecting all human systems due to wireless RFR exposure

should be added immediately. These measures need to be added and adhered to strictly without any extension of time.

Industry convenience should not be a consideration when trying to protect the public's health as these measures are intended to do, especially given the rushed and reckless manner these wireless technologies are being deployed.

Sadly, this appears to be another effort by industry to work around RF safety which has been the norm that has led to ever increasing portion of our population reporting symptoms of Microwave Sickness, often with no idea that the source is a wireless antenna nearby. I do not know how Mr Evans and The National Spectrum Managers Association can make this request in good conscience given the serious illnesses already reported through testimonials and supported by science attached to the dockets mentioned above. The level of Microwave Sickness in our population can only be expected to increase with the increased levels RFR exposure expected from additional deployment of these wireless systems.

Thus Mr. Evans and his petition proposes to continue to rush deployment of 5G and other advanced and not so advanced wireless technologies but take our time in adhering to simple measurements of increased RFR energy in our environment. This is ridiculous, ludicrous, irrational, irresponsible and dangerous thinking at best given what has already been proven about wireless RF Radiation effects.

I do not understand Mr. Evans and The National Spectrum Managers Association protests in their petition since CTIA and various members of the wireless industry have long testified to congress that one of the greatest benefits of the roll out of 5G and deployment and densification of other wireless systems will be job creation. So to Mr. Evans and his association I say go ahead and hire as many people as you need to do this testing quickly and create those jobs that you have been boasting to every Congressman that will listen about. This is an opportunity to create those promised jobs and protect the public which CTIA goes around congress stating that 5G and increased densification is meant to benefit.

**We strongly OPPOSE these petitions listed below.**

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